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September 21, 2023

VIA ECF

The Honorable Valerie Figueredo
United States Magistrate Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Application Granted



Valerie Figueredo, U.S.M.J.

DATED: September 25, 2023

The parties are directed to provide a status update by **November 7, 2023** if a notice of voluntary dismissal has not been filed prior to that date. The Clerk of Court is respectfully directed to terminate the motion at ECF No. 18.

Re: *Campbell v. BGB Group, Limited*, Case No. 1:23-cv-02279-PAE-VF

Dear Judge Figueredo:

We represent Defendant BGB Group, Limited ("Defendant") in the above-referenced matter. Together with counsel for plaintiff, we jointly and respectfully move this Court to stay all case deadlines in this action for forty five (45) days, from September 21, 2023 to November 7, 2023.

This requested stay will permit the parties to finalize their efforts to bring about the voluntary dismissal of all claims asserted in this action without further litigation. Once those efforts are complete, voluntary dismissal will be filed.

Respectfully submitted,

/s/ Rebecca A. Stark
Rebecca A. Stark

cc: All counsel of record (by ECF)